

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CHRISTOPHER CRUZ,

Plaintiffs,

-against-

COUNTY OF SUFFOLK, SUFFOLK COUNTY POLICE DEPARTMENT, Commissioner Geraldine Hart, in her Individual and official capacity, PO Matthew Cameron, in his individual and official capacity, PO Jared Gresh, in his individual and official capacity, PO Frank Filiberto, in his individual and official capacity, PO Juan Borbon, in his individual and official capacity, PO Shaun Sullivan, in his individual and official capacity, PO William Bubeck, in his individual and official capacity, PO Anthony Legotti, in his individual and official capacity, PO Stephen Russ, in his individual and official capacity, PO Salvatore Sillitti, in his individual and official capacity, PO Vincent Bruno, in his individual and official capacity, PO Anthony DeMeo, in his individual and official capacity, PO Joseph Sinacori, in his individual and official capacity, PO Daniel Boylan, in his individual and official capacity, Det. Michael Rottler, in his individual and official capacity, PO Christopher Draskin, in his individual and official capacity, PO Matthew Merced, in his individual and official capacity, Police Officers “John and Jane Does 1-10,” in their individual and official capacities,

Defendants.

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**ANSWER WITH
CROSS-CLAIMS
JURY DEMAND**

22-cv-00993 (DRH)(ARL)

Defendant, MATTHEW CAMERON, by her attorneys, WILLIAM P. NOLAN, ESQ., as and for an Answer to Plaintiffs’ Complaint and Jury Demand, respectfully sets forth as follows:

1. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 1 of the Complaint and refers all questions of law to the Court.

2. Defendant CAMERON denies the allegations contained in paragraph 2 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 2 of the Complaint.

3. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 3 of the Complaint.

4. Defendant CAMERON denies the allegations contained in paragraph 4 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 4 of the Complaint.

5. Defendant CAMERON denies the allegations contained in paragraph 5 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 5 of the Complaint.

6. Defendant CAMERON denies the allegations contained in paragraph 6 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 6 of the Complaint.

7. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 7 of the Complaint and refers all questions of law to the Court.

8. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 8 of the Complaint and refers all questions of law to the Court.

9. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 9 of the Complaint.

10. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 10 of the Complaint.

11. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 11 of the Complaint.

12. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 12 of the Complaint.

13. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 13 of the Complaint.

14. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 14 of the Complaint.

15. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 15 of the Complaint.

16. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 16 of the Complaint.

17. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 17 of the Complaint.

18. Admits as to Defendant CAMERON, at all times he was acting within the scope and course of his employment as a Suffolk County Police Officer, acting under the color of law. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 18 of the Complaint.

19. Admits as to Defendant CAMERON that he was a resident of the State of New York. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 19 of the Complaint.

20. Admit.

21. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 21 of the Complaint and refers all questions of law to the Court.

22. Admits as to Defendant CAMERON.

23. Defendant CAMERON denies the allegations contained in paragraph 23 of the Complaint.

24. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 24 of the Complaint.

25. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 25 of the Complaint.

26. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 26 of the Complaint.

27. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 27 of the Complaint.

28. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 28 of the Complaint.

29. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 29 of the Complaint.

30. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 30 of the Complaint.

31. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 31 of the Complaint.

32. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 32 of the Complaint.

33. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 33 of the Complaint.

34. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 34 of the Complaint.

35. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 35 of the Complaint.

36. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 36 of the Complaint.

37. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 37 of the Complaint.

38. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 38 of the Complaint.

39. Defendant CAMERON denies the allegations contained in paragraph 39 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 39 of the Complaint.

40. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 40 of the Complaint.

41. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 41 of the Complaint.

42. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 42 of the Complaint.

43. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 43 (a-t) of the Complaint.

44. Defendant CAMERON denies the allegations contained in paragraph 44 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 44 of the Complaint.

45. Defendant CAMERON denies the allegations contained in paragraph 45 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 45 of the Complaint.

46. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 46 of the Complaint.

47. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 47 of the Complaint.

48. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 48 of the Complaint.

49. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 49 of the Complaint.

50. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 50 of the Complaint.

51. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 51 of the Complaint.

52. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 52 of the Complaint.

53. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 53 of the Complaint.

54. Defendant CAMERON denies the allegations contained in paragraph 54 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 54 of the Complaint

55. Defendant CAMERON denies the allegations contained in paragraph 55 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 55 of the Complaint.

56. Defendant CAMERON denies the allegations contained in paragraph 56 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 56 of the Complaint

57. Defendant CAMERON denies the allegations contained in paragraph 57 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 57 of the Complaint

58. Defendant CAMERON denies the allegations contained in paragraph 58 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 58 of the Complaint

59. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 24 of the Complaint.

60. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 60 of the Complaint.

61. Defendant CAMERON denies the allegations contained in paragraph 61 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 61 of the Complaint.

62. Defendant CAMERON denies the allegations contained in paragraph 62 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 62 of the Complaint.

63. Defendant CAMERON denies the allegations contained in paragraph 63 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 63 of the Complaint.

64. Defendant CAMERON denies the allegations contained in paragraph 64 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 64 of the Complaint.

65. Defendant CAMERON denies the allegations contained in paragraph 65 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 65 of the Complaint.

66. Defendant CAMERON denies the allegations contained in paragraph 66 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 66 of the Complaint.

67. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 67 of the Complaint.

68. Defendant CAMERON denies the allegations contained in paragraph 68 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 68 of the Complaint.

69. Defendant CAMERON denies the allegations contained in paragraph 69 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 69 of the Complaint.

70. Defendant CAMERON denies the allegations contained in paragraph 70 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 70 of the Complaint.

71. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 71 of the Complaint.

72. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 72 of the Complaint.

73. Defendant CAMERON denies the allegations contained in paragraph 73 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 73 of the Complaint.

74. Defendant CAMERON denies the allegations contained in paragraph 74 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 74 of the Complaint.

75. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 75 of the Complaint and refers all questions of law to the Court.

76. Defendant CAMERON denies the allegations contained in paragraph 76 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 76 of the Complaint.

77. Defendant CAMERON denies the allegations contained in paragraph 77 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 77 of the Complaint.

78. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 75 of the Complaint and refers all questions of law to the Court.

79. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 79 of the Complaint.

80. Defendant CAMERON denies the allegations contained in paragraph 80 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 80 of the Complaint.

81. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 81 of the Complaint and refers all questions of law to the Court.

82. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 82 of the Complaint and refers all questions of law to the Court.

83. Defendant CAMERON denies the allegations contained in paragraph 83 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 83 of the Complaint.

84. Defendant CAMERON denies the allegations contained in paragraph 84 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 84 of the Complaint.

85. Defendant CAMERON denies the allegations contained in paragraph 85 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 85 of the Complaint.

86. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 86 of the Complaint.

87. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 86 of the Complaint.

88. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 86 of the Complaint.

89. Defendant repeats, re-iterates and re-alleges the responses to the allegations set forth in paragraphs “1” through “88” above with the same force and effect as if fully set forth herein.

90. Defendant CAMERON denies the allegations contained in paragraph 90 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 90 of the Complaint.

91. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 91 of the Complaint and refers all questions of law to the Court.

92. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 92 of the Complaint and refers all questions of law to the Court.

93. Defendant CAMERON denies the allegations contained in paragraph 93 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 93 of the Complaint.

94. Defendant CAMERON denies the allegations contained in paragraph 94 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 94 of the Complaint.

95. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 95 of the Complaint and refers all questions of law to the Court.

96. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 96 of the Complaint.

97. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 97 of the Complaint. and refers all questions of law to the Court.

98. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 98 of the Complaint and refers all questions of law to the Court.

99. Defendant CAMERON denies the allegations contained in paragraph 99 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 99 of the Complaint.

100. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 100 of the Complaint.

101. Defendant CAMERON denies the allegations contained in paragraph 101 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 101 of the Complaint.

102. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 102 of the Complaint and refers all questions of law to the Court.

103. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 103 of the Complaint and refers all questions of law to the Court.

104. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 104 of the Complaint and refers all questions of law to the Court.

105. Defendant CAMERON denies the allegations contained in paragraph 105 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 105 of the Complaint.

106. Defendant CAMERON denies the allegations contained in paragraph 106 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 106 of the Complaint.

107. Defendant CAMERON denies the allegations contained in paragraph 107 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 107 of the Complaint.

108. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 108 of the Complaint and refers all questions of law to the Court.

109. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 109 of the Complaint and refers all questions of law to the Court.

110. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 110 of the Complaint.

111. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 111 of the Complaint and refers all questions of law to the Court.

112. Defendant repeats, re-iterates and re-alleges the responses to the allegations set forth in paragraphs “1” through “111” above with the same force and effect as if fully set forth herein.

113. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 113 of the Complaint.

114. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 114 of the Complaint.

115. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements in paragraph 115 of the Complaint.

116. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 116 of the Complaint.

117. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 117 of the Complaint.

118. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 118 (a-h) of the Complaint.

119. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 119 of the Complaint.

120. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 120 of the Complaint.

121. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 121 of the Complaint.

122. Defendant CAMERON denies the allegations contained in paragraph 122 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 122 of the Complaint.

123. Defendant CAMERON denies the allegations contained in paragraph 123 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 123 of the Complaint.

124. Defendant CAMERON denies the allegations contained in paragraph 124 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 124 of the Complaint.

125. Defendant CAMERON denies the allegations contained in paragraph 125 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 125 of the Complaint.

126. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 126 of the Complaint and refers all questions of law to the Court.

127. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 127 of the Complaint and refers all questions of law to the Court.

128. Defendant repeats, re-iterates and re-alleges the responses to the allegations set forth in paragraphs “1” through “127” above with the same force and effect as if fully set forth herein.

129. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 129 of the Complaint.

130. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 130 of the Complaint.

131. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 131 of the Complaint.

132. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 132 of the Complaint.

133. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 133 of the Complaint.

134. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 134 of the Complaint.

135. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 135 of the Complaint.

136. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 136 of the Complaint and refers all questions of law to the Court.

137. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 137 (a-e) of the Complaint.

138. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 138 of the Complaint and refers all questions of law to the Court.

139. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 139 of the Complaint and refers all questions of law to the Court.

140. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 140 of the Complaint and refers all questions of law to the Court.

141. Defendant repeats, re-iterates and re-alleges the responses to the allegations set forth in paragraphs “1” through “140” above with the same force and effect as if fully set forth herein.

142. Defendant CAMERON denies the allegations contained in paragraph 142 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 142 of the Complaint.

143. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 143 of the Complaint.

144. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 144 of the Complaint and refers all questions of law to the Court.

145. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 145 of the Complaint and refers all questions of law to the Court.

146. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 146 of the Complaint and refers all questions of law to the Court.

147. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 147 of the Complaint and refers all questions of law to the Court.

148. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 148 of the Complaint and refers all questions of law to the Court.

149. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 149 of the Complaint and refers all questions of law to the Court.

150. Defendant repeats, re-iterates and re-alleges the responses to the allegations set forth in paragraphs “1” through “149” above with the same force and effect as if fully set forth herein.

151. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 151 of the Complaint and refers all questions of law to the Court.

152. Defendant CAMERON denies the allegations contained in paragraph 152 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 152 of the Complaint.

153. Defendant CAMERON denies the allegations contained in paragraph 153 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 153 of the Complaint.

154. Defendant CAMERON denies the allegations contained in paragraph 154 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 154 of the Complaint.

155. Defendant CAMERON denies the allegations contained in paragraph 155 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 155 of the Complaint.

156. Defendant CAMERON denies the allegations contained in paragraph 156 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 156 of the Complaint.

157. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 157 of the Complaint and refers all questions of law to the Court.

158. Defendant CAMERON denies the allegations contained in paragraph 158 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 158 of the Complaint.

159. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 159 of the Complaint and refers all questions of law to the Court.

160. Defendant repeats, re-iterates and re-alleges the responses to the allegations set forth in paragraphs “1” through “159” above with the same force and effect as if fully set forth herein.

161. Defendant CAMERON denies the allegations contained in paragraph 161 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 161 of the Complaint.

162. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 162 of the Complaint and refers all questions of law to the Court.

163. Defendant CAMERON denies the allegations contained in paragraph 163 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 163 of the Complaint.

164. Defendant CAMERON denies the allegations contained in paragraph 164 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 164 of the Complaint.

165. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 165 of the Complaint.

166. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 166 of the Complaint and refers all questions of law to the Court.

167. Defendant repeats, re-iterates and re-alleges the responses to the allegations set forth in paragraphs “1” through “166” above with the same force and effect as if fully set forth herein.

168. Defendant CAMERON denies the allegations contained in paragraph 168 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 168 of the Complaint.

169. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 169 of the Complaint.

170. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 170 of the Complaint and refers all questions of law to the Court.

171. Defendant repeats, re-iterates and re-alleges the responses to the allegations set forth in paragraphs “1” through “170” above with the same force and effect as if fully set forth herein.

172. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 171 of the Complaint and refers all questions of law to the Court.

173. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 172 of the Complaint and refers all questions of law to the Court.

174. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 173 of the Complaint and refers all questions of law to the Court.

175. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 174 of the Complaint and refers all questions of law to the Court.

176. Defendant repeats, re-iterates and re-alleges the responses to the allegations set forth in paragraphs “1” through “175” above with the same force and effect as if fully set forth herein.

177. Defendant CAMERON denies the allegations contained in paragraph 177 of the Complaint. As to the other named Defendants, denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 177 of the Complaint.

178. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 178 of the Complaint and refers all questions of law to the Court.

179. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 179 of the Complaint and refers all questions of law to the Court.

180. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 180 of the Complaint and refers all questions of law to the Court.

181. Defendant repeats, re-iterates and re-alleges the responses to the allegations set forth in paragraphs “1” through “180” above with the same force and effect as if fully set forth herein.

182. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 182 of the Complaint and refers all questions of law to the Court.

183. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 183 of the Complaint and refers all questions of law to the Court.

184. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 184 of the Complaint and refers all questions of law to the Court.

185. Defendant CAMERON denies knowledge or information sufficient to form a belief as to the truth of the statements contained in paragraph 185 of the Complaint and refers all questions of law to the Court.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

186. Plaintiff has failed to set forth an adequate factual basis to support any cause of action against Defendant CAMERON or that she was personally involved in the deprivation of rights as alleged in the complaint.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

187. Any injury alleged to have sustained results from Plaintiff’s own culpable, and/or negligent conduct or the culpable and/or negligent conduct of third parties and was not the proximate result of any act of Defendant CAMERON.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

188. Defendant CAMERON has not violated any rights, privileges, or immunities under the Constitution or laws of the United States or the State of New York or any political subdivision thereof.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

189. Upon information and belief, the injuries or damages alleged in the complaint may have been caused in whole or in part by the parties now or hereafter to be named in as co-Defendant or third-party Defendant. Accordingly, the liability of Defendant may be limited.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

190. At all times relevant to the acts alleged in the complaint, Defendant CAMERON acted lawfully, reasonably, in good faith and in proper and lawful exercise of his authority and discretion as a Suffolk County Police Officer.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

191. Plaintiff is not entitled to recover damages in this action under 42 U.S.C §1983 against the answering Defendant CAMERON.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE

192. Defendant CAMERON is shielded from liability under the doctrine of qualified immunity.

AS AND FOR A EIGHTH AFFIRMATIVE DEFENSE

193. That this action was not commenced within the applicable time limits, therefore, the Statute of Limitations constitutes a complete defense to plaintiff's action.

AS AND FOR A NINTH AFFIRMATIVE DEFENSE

194. At the time and place mentioned in the Complaint, defendant CAMERON violated no legal duty.

AS AND FOR A TENTH AFFIRMATIVE DEFENSE

195. Plaintiff's request for punitive damages should be denied as defendant CAMERON did not undertake any conduct that was in any way wanton, reckless, or outrageous.

AS AND FOR AN ELEVENTH AFFIRMATIVE DEFENSE

196. Defendant CAMERON's actions or omissions are not the proximate cause of the alleged injuries and damages.

AS AND FOR A TWELVETH AFFIRMATIVE DEFENSE

197. The alleged damages and injuries, if any, were proximately caused by unforeseen superseding and/or intervening causes, and not by answering defendants' actions or omissions.

AS AND FOR A THIRTEENETH AFFIRMATIVE DEFENSE

199. That the actions of the Defendant Cameron, if any, were justified by the facts and circumstances presented.

AS AND FOR A FORTEENETH AFFIRMATIVE DEFENSE

197. That the arrest and/or detention, if any, were reasonable and based upon probable cause to believe that the plaintiff had committed a crime and/or offense.

**FIRST CROSS-CLAIM AGAINST
DEFENDANT COUNTY OF SUFFOLK**

198. At all times relevant in this action, all of the actions of defendant were performed as part of his duties and within the scope of his employment and the rules and regulations as a Police Officer for the County of Suffolk.

199. Any damages sustained by the plaintiff at the time or place mentioned in the Complaint is embraced within the indemnification clause of Section 50-m of the New York State Municipal Law.

200. Pursuant to 50-M, if it is shown that the defendant is in any way liable to the plaintiff based upon the allegations in the Complaint, the defendant is entitled to recover from the County of Suffolk the full amount of the judgement which might be rendered against the defendant.

**SECOND CROSS-CLAIM AGAINST
DEFENDANT COUNTY OF SUFFOLK**

201. Repeats, reiterates and realleges each and every admission and denial heretofore made to the allegations contained in the paragraphs mentioned in paragraph numbered “1” through “185” of the Complaint with the same force and effect as if here repeated and again set forth at length.

202. Defendant has denied the material allegations asserted against him in the underlying action and has asserted affirmative defenses.

203. If the plaintiff sustained injuries and damages alleged in the Complaint, such injuries and damages were sustained by reason of negligence by the Defendant County of Suffolk, its agents, servants and/or employees.

204. Therefore, if the injuries and damages alleged in the Complaint were caused as a result of negligence or wrongdoing other than by plaintiff’s own culpable conduct, then such damage is a result of the knowing, reckless and/or grossly negligent acts and omissions of the Defendant County of Suffolk and its supervisory officials, and not Defendant Cameron.

205. Consequently, if it is shown that the defendant is in any way liable to the plaintiff

based upon the allegations in the Complaint, defendant is entitled to recover from the County of Suffolk the full amount of any judgment that might be rendered against the defendant.

WHEREFORE, the defendant, respectfully demands:

(a) demands judgment against the plaintiff dismissing the Amended Complaint herein, together with costs and disbursements of this action.

(b) Judgement on each crossclaim against the defendant City of New York for the amount of any judgement that may be obtained herein by the plaintiff against the defendant, or in an amount equal to the excess over and above her equitable share of any such judgment, and;

(c) Judgement granting the costs and disbursements of this action, and such other and further relief as the Court may deem just and proper.

Dated: Garden City, New York
May 10, 2022

WILLIAM P. NOLAN, ESQ.

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